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23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA

25 SAN FRANCISCO DIVISION

26 SONOS, INC.,

27 Plaintiff,

28 vs.

GOOGLE LLC,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Consolidated with CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN  
SUPPORT OF GOOGLE LLC'S  
UNOPPOSED ADMINISTRATIVE  
MOTION TO EXTEND DEADLINES FOR  
NEW MOTION TO SEAL AND PUBLIC  
REFILINGS PURSUANT TO DKT. 846**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP  
4 representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Motion to Extend Deadlines for New  
7 Motion to Seal and Public Refilings Pursuant to Dkt. 846.

8 3. I understand that since receiving the Court’s order, Google and Google’s counsel  
9 have worked diligently to ensure that its revised sealing requests are as narrowly tailored as possible.

10 4. However, Google requires additional time to prepare its revised sealing requests in  
11 order to undertake the necessary preparations for the public disclosure of business information in  
12 light of the fact that documents Google previously sought to seal include detailed technical  
13 specifications, identification of source code information, and Google’s business plans regarding the  
14 relevant products, to determine the impact of disclosure and level of confidentiality attributed to  
15 each portion of these and other categories of documents, and to provide detailed information for the  
16 bases for each request to seal such that they “speak to specific information in specific passages” and  
17 describe any narrowing from the original request and any revised request. Dkt. 843 at 3.

18 5. I understand that without an extension, Google will be substantially harmed by being  
19 unable to thoroughly analyze each previous passage that it sought to seal and determine whether  
20 such information needs to remain under seal—potentially resulting in the disclosure of highly  
21 sensitive and confidential information and/or the submission of a revised request to seal that is  
22 inadvertently deficient with respect to the requirements of the Court’s order.

23 6. On July 28, 2023, Google asked Sonos, Inc. (“Sonos”) to stipulate to an extension of  
24 the deadlines for Google’s new omnibus motion to seal and the parties’ refilings of material it no  
25 longer seeks to seal. Sonos refused to do so but indicated that it would not oppose if Google filed a  
26 motion to enlarge time.

27 7. The proposed extensions will not affect the parties’ ability to comply with the other  
28 deadlines set forth in this case.

8. With respect to Civil L.R. 6-3(a)(5), I am aware of the following previous modifications to the case schedule based on my review of the docket:

- a. On March 12, 2022, the Parties stipulated to an extension of Google's deadline to answer or move to dismiss Sonos's counterclaims to seven days after the Court's order on Google's motion to dismiss in the related case. Dkt. 156.
- b. On May 18, 2022, the Court vacated the initial patent showdown trial date and set the trial for October 3, 2022. Dkt. 269.
- c. On May 4, 2022, the Court granted the Parties' stipulated request to extend the mediation deadline to accommodate their preferred mediator's schedule. Dkt. 245.
- d. On July 15, 2022, the Court granted the Parties' stipulated request to extend expert pretrial deadlines for the patent showdown trial. Dkt. 304.
- e. On August 22, 2022, the Court granted the parties' stipulated request to extend the expert discovery deadline for the patent showdown trial. Dkt. 328.
- f. On November 14, 2022, the Court granted the Parties' stipulated request to extend expert report and discovery deadlines. Dkt. 402.
- g. On December 7, 2022, the Court granted the Parties' stipulated request to extend the deadline for Google's Opposition to Sonos's Motion for Leave to Amend Infringement Contentions Pursuant to Patent L.R. 3-6. Dkt. 417.
- h. On December 22, 2022, the Court granted the Parties' stipulated request to extend the deadline for Expert Discovery, Expert Reports, and Dispositive Motions. Dkt. 434.
- i. On January 4, 2023, the Court advanced the trial date from May 10, 2023 to May 8, 2023. Dkt. 444.
- j. On January 27, 2023, the Court granted the Parties' stipulated request to extend the close of fact discovery to accommodate the Parties' expert witnesses' schedules. Dkt. 460.
- k. On March 9, 2023, the Court granted the Parties' stipulated request for an order setting a schedule for pretrial deadlines. Dkt. 547.
- l. On June 7, 2023, the Court granted the Parties' joint stipulation extending time for filing bill of costs. Dkt. 811.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on July 28, 2023, in San Francisco, California.

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By: /s/ Jocelyn Ma  
Jocelyn Ma

**ECF ATTESTATION**

I, Sean Pak, am the ECF User whose ID and password are being used to file this Declaration.  
In compliance with Civil Local Rule 5-1, I hereby attest that Jocelyn Ma has concurred in this filing.

Dated: July 28, 2023

By: /s/ Sean Pak  
Sean Pak